

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN

---

In re: Jennifer & Israel R. McKinney

Case No. 22-11558-13

Debtor(s)

---

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

---

Mark Harring, Standing 13 Trustee, by his attorney, objects to confirmation of the Amended Chapter 13 Plan and Request to Amend Unconfirmed Plan filed as Document #161 on 1/12/2024 and states as follows:

1. Plan is amended to increase plan payments from \$15,000/mo to \$21,000/mo starting in January 2025 and again to \$24,000 starting in July 2026. The debtors have not provided any support for their ability to make the future increases. We note the debtors have been able to make the plan payments to date.
2. Plan is amended to indicate debtors' attorney will be filing a separate Fee Application for approximately \$20,000 based on the fact this office has already distributed \$10,000 to the attorney.
3. Plan is amended to adjust treatment of the secured obligation due IRS with a claim balance of \$412,301.19, interest of 8% and equal monthly payments of \$4452.53/mo. The plan indicates these equal monthly payments were to start back in October 2023 although this office has been making adequate protection payments of \$6870.94/mo based on earlier plans. We acknowledge with the reduction in equal payments that IRS has been overpaid by \$2418.41/mo since October 2023. Unfortunately, even with crediting the overpayments, this plan does not provide the funds necessary to comply with the terms of this IRS treatment. This office has provided debtors' attorney with our calculations in the hopes of explaining the issue.
4. Plan is amended to adjust treatment of the priority amounts due IRS. We note IRS amended its claim on 1/10/2024 and the priority amount this office will pay is the claim amount of \$675,299.61.
5. The filing of these documents does resolve the 11/30/2023 Court Order with extension to 1/12/2024.

Dated: January 24, 2024

Standing Chapter 13 Trustee

By: /s/ *Leslie Brodhead Griffith*  
Leslie Brodhead Griffith  
Attorney for Trustee  
122 W Washington Ave, Suite 500  
Madison, WI 53703-2758  
(608) 256-4320